



50 Park Place, Suite 1105
Newark, NJ 07102

Josiah Contarino
Phone: 917-423-7221
jcontarino@dhillonlaw.com

June 6, 2023

VIA EMAIL

United States Attorney
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Michael Blume
Joseph Marutollo
Paulina Stamatelos
Assistant United States Attorneys

Re: *United States v. Rare Breed Triggers, LLC, et al.*
Civil Action No. 1:23-cv-00369-NRM-RML

Dear Counsel:

This firm represents Defendants in the captioned matter. In furtherance of the parties' scheduling call on May 31, we are producing documents Bates-numbered RTF 0000001-6071, which can be downloaded from the following link: [REDACTED]

We also write to provide our understanding of Defendants' document collection process to date:¹

- We understand that the following Rare Breed Triggers email accounts were forensically collected: dealersales@rarebreedtriggers.com, admin@rarebreedtriggers.com, customerservice@rarebreedtriggers.com. This collection resulted in 77,668 documents. The following search terms were applied to this collection, which produced approximately 8,000 documents: ATF letter, ATF approval, Illegal, Legality, Legal, Machinegun, Machine gun, Full auto.
- In addition, we understand a self-collection search was made of Defendant Lawrence DeMonico's Gmail account, with such search based on the following search conditions: Wolf Tactical and AR1 Trigger; Wolf Tactical and US Patent Number 10,514,223; Iberiabank, N.A.; Cole Leleux and RBT or RBF; Kelly Leleux and RBT or RBF; Michael Register and RBT or RBF; Jennifer Pierson and RBT or RBF; Chase Paymentech; JP Morgan Chase; Kevin Maxwell; Rick Vasquez; Rick Vasquez Firearms, LLC; 10,514,223; and any documents to/from RBT or RBF, resulting in 1,956 documents.
- We also understand a search of admin@rarebreedfirearms.com for all documents to/from

¹ As you know, this firm filed a notice of appearance in this matter on May 24, 2023.

June 2, 2023

Page 2 of 2

RBT was performed and 37 documents collected. Finally, there was a general gathering of documents that include many pleadings, agreements, and USPTO documents.²

We also write to advise that Defendants do not plan to contest the subpoenas issued to JP Morgan Chase and Fifth Third Bank on May 16, 2023.³

Very truly yours,

DHILLON LAW GROUP INC.

By: /s/ Josiah Contarino

Josiah Contarino

cc: David A. Warrington (via email)
Michael A. Columbo (via email)

² As discussed on the parties' May 31 call, Defendants will be completing the objections and responses to Plaintiff's demands, and all rights in that regard are reserved.

³ On the parties' May 31 call, AUSA Blume raised the possibility of Defendants identifying what subpoenas they could determine would not be challenged, *not* what subpoenas would be challenged, as AUSA Stamatelos's June 1 email suggests. Defendants may, of course, decide to not challenge other subpoenas, but that determination has not yet been made.